

# Duff Law PLLC

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April 18, 2023

**VIA ECF**

Hon. Analisa Torres  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

Re: *Eli Erlick v. Blaire White*, 23 Civ. 1017 (AT) (SDNY)  
*Letter Motion Requesting Second Thirty-Day Extension of Time to Answer*

Dear Judge Torres:

In accordance with Your Honor's individual Rule III.B.ii, Defendant served her first pre-motion letter outlining Defendant's contemplated motion to dismiss on March 20, 2023 before the deadline for Defendant's response to the Complaint in the above-captioned action. On March 21, 2023, counsel for both parties engaged in a productive telephonic discussion of Defendant's March 20, 2023 letter and potential settlement options. On April 3, 2023, Plaintiff served her first pre-motion letter responding to Defendant's March 20, 2023 letter outlining Defendant's contemplated motion to dismiss. On April 18, 2023, Plaintiff's counsel circulated a draft settlement agreement in accordance with the Parties' ongoing settlement discussions.

Defendant's response to the Complaint in the above-captioned matter was initially due on March 20, 2023, which was the date on which Defendant served her first pre-motion letter on Plaintiff's counsel. On March 27, 2023, Your Honor granted a 30-day extension of the deadline for Defendant to respond to the Complaint. (Mar. 27, 2023 Order, ECF No. 12.) Defendant's response to Plaintiff's Complaint is currently due tomorrow, **April 19, 2023**. While Defendant is prepared to file a pre-motion letter describing her anticipated motion to dismiss, both Parties agree that their concrete progress toward settlement of this matter warrants a further 30-day extension of Defendant's time to respond to the Complaint. Such an extension would be the second extension of Defendant's time to respond to the Complaint, and Plaintiff's counsel consents to this requested 30-day extension.

For the foregoing reasons and in accordance with Your Honor's individual rules, Defendant hereby asks for a 30-day extension of the deadline for her response to the Complaint in this action.

Respectfully,

By:

  
Anderson J. Duff

AJD/jo